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6 FIDELITY NATIONAL TITLE INSURANCE  
COMPANY

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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

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11 BJK ENTERPRISES, INC.,

12 Plaintiff,

13 vs.

14 FIDELITY NATIONAL TITLE  
INSURANCE COMPANY; HORIZON  
NATIONAL TITLE INSURANCE, LLC;  
DOES 1-IV; ROE CORPORATIONS I-IV,

15 Defendants.

16 Case No.: 2:19-CV-01776-KJD-VCF

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**STIPULATION AND ORDER  
EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO COMPLAINT**

**(Second Request)**

Plaintiff BJK Enterprises, Inc. ("Plaintiff") and Defendant Fidelity National Title Insurance Company ("Fidelity"), by and through their counsel of record, hereby stipulate as follows:

**WHEREAS**, Plaintiff filed its complaint in the matter in Nevada's Eighth District Court in and for Clark County on September 9, 2019;

**WHEREAS**, Fidelity was served with the summons and complaint on or about September 23, 2019;

**WHEREAS**, Plaintiff's response to the complaint was originally due on or about October 15, 2019;

1           **WHEREAS**, the parties previously stipulated to extend Fidelity's time to respond to the  
2 complaint to November 6, 2019;

3           **WHEREAS**, the parties are discussing the possibility of entering into a stipulation of  
4 dismissal;

5           **WHEREAS**, this is the second stipulation for an extension of Fidelity's time to respond to  
6 the complaint.

7           Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate  
8 and agree as follows:

- 9           1. Fidelity shall file its response to the complaint on or before November 21, 2019.

11          Dated: November 4, 2019

EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP

13          By: /s/ Sophia S. Lau  
14           SOPHIA S. LAU  
15           Attorneys for Defendant  
16           FIDELITY NATIONAL TITLE INSURANCE  
17           COMPANY

16          Dated: November 4, 2019

GUINNESS LAW FIRM

18          By: /s/ Guinness Ohazuruike  
19           GUINNESS OHAZURIKE  
20           Attorneys for Plaintiff  
21           BJK ENTERPRISES, INC.

22           **ORDER**

24           **IT IS SO ORDERED:**

25          By:   
26           UNITED STATES MAGISTRATE JUDGE

27           11-6-2019  
28           Dated: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of EARLY SULLIVAN WRIGHT GIZER & McRAE, LLP and that on November 4, 2019 the foregoing **STIPULATION AND PROPOSED ORDER EXTENDING DEFENDANT FIDELITY NATIONAL TITLE INSURANCE COMPANY'S TIME TO RESPOND TO COMPLAINT (Second Request)** was served on all parties and counsel identified on the CM/ECF System via Electronic Notification, including on the following counsel:

Guinness Ohazuruike  
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/s/-D'Metria Bolden  
D'METRIA BOLDEN